

# **EXHIBIT 25**

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, )  
INC., PASSENGER SEXUAL ASSAULT ) MDL No. 3084 CRB  
LITIGATION )  
)

LCHB128 v. Uber Technologies, Inc., et al.  
Case No. 3:24-cv-07019-CRB  
A.R. v. Uber Technologies, Inc., et al.  
Case No. 3:24-cv-07821  
B.L. v. Uber Technologies, Inc., et al.,  
Case No. No. 24-cv-7940  
Jaylynn Dean v. Uber Technologies, Inc., et al.,  
3:23-cv-06708  
WHB 832 v. Uber Technologies, Inc., et al.,  
3:24-cv-04900

HIGHLY CONFIDENTIAL  
UNDER PROTECTIVE ORDER

VIDEOTAPED DEPOSITION OF GREG BROWN, VOL. II -  
WAVE 1 PLAINTIFFS' 30(b)(6) DEPOSITION OF UBER  
TECHNOLOGIES, INC., RASIER LLC, AND RASIER-CA, LLC,  
(TOPICS 4A-D, 6A-G, 7A-D, 8A-N, 9A-E, 10A, B, C, E,  
AND F)

August 26, 2025  
7:40 a.m. Pacific Standard Time

Reported by: Renee Ogden, RPR, California CSR #14485

1 as he appears to have issued broadly similar  
2 reports on a number of rides in fairly quick  
3 succession.

4 Q. Can we pull up the next exhibit, Exhibit 1989?

5 MARKED FOR IDENTIFICATION:

6 DEPOSITION EXHIBIT 1989

7 Uber Bot Communication with Jennifer  
8 3:24 p.m.

9 BY ATTORNEY LEVY:

10 Q. Take a minute and look through the documents that  
11 are in the compilation of 1989.

12 A. Yes. Similarly, I recognize these documents, yes.

13 Q. What is Exhibit 1989?

14 A. This, again, appears to series of listener actions  
15 involving a user named Jennifer who is continuing  
16 to repeat very similar claims of problematic  
17 behavior against her involving multiple trips with  
18 different drivers on the platform.

19 Q. Can you tell me what you mean? When you say that,  
20 what do you mean? Why was this complaint against  
21 Mr. Turay by this driver eventually determined by  
22 Uber to be support abuse?

23 A. In reviewing the series --

24 ATTORNEY PETERS: Object to form.

25 A. In reviewing the series of complaints issued by

1 Jennifer in this case they appear to all be broadly  
2 similar, serious reports made in rapid succession  
3 containing many of the same words and phrases.  
4 This would be a classic definition of support  
5 abuse, the intent here not to be actually to report  
6 a serious safety incident, but instead to report  
7 multiple of the same thing over and over as an  
8 attempt to game the system and receive refunds.

9 BY ATTORNEY LEVY:

10 Q. At the time of the subject incident in the Dean  
11 case, the driver, Hassan Turay, had been a driver  
12 on the Uber platform for seven years, correct?

13 A. That's my understanding, yes.

14 Q. During questioning by counsel on this matter  
15 earlier, you were pointed to the fact that in those  
16 seven years the driver had 62 one-star ratings. Do  
17 you recall that?

18 A. I do.

19 Q. Do you have your deposition aid from today in front  
20 of you?

21 A. Yes, yes, I do.

22 Q. Okay. And what -- you were asked about one-star  
23 ratings and two-star ratings, but what counsel  
24 conveniently did not ask you about is how many  
25 total rides had been completed by Mr. Turay had at

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## REPORTER'S CERTIFICATE

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I, RENEE J. OGDEN, shorthand reporter

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CA CSR No. 14485, do hereby certify that the  
5 witness whose deposition is hereinbefore set  
6 forth was sworn by agreement of all parties,  
7 that the proceedings were reported  
8 stenographically by me, and that this  
9 transcript is a true, correct, and full  
10 record of the testimony given.

11

12

I further certify that I am not related  
13 to any of the parties to this action by blood  
14 or by marriage, and that I am in no way  
15 interested in the outcome of this matter.

16

17

IN WITNESS WHEREOF, I have hereunto set  
18 my hand on August 28, 2025.

19

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Renee J. Ogden, CA CSR No. 14485

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